



U.S. Department of Justice

*United States Attorney
Southern District of New York*

MEMO ENDORSED

*United States Attorney's Office
50 Main Street, Suite 1100
White Plains, New York 10606*

October 20, 2023

BY ECF

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: ***United States v. Savon Bagby, 23 Cr. 299 (KMK)***

Dear Judge Karas:

A status conference in the above-captioned case is currently scheduled for October 31, 2023 at 3:30 p.m. The Government understands that the defendant, Savon Bagby, intends to plead guilty to the charge in the Information (unlawful possession of a firearm). However, a plea hearing has not yet been scheduled, despite the Government's attempts to schedule a hearing with defense counsel. It is the Government's hope that a plea hearing can be scheduled in the next 60 days. Accordingly, the Government respectfully requests an adjournment of the status conference.

In addition, the Court granted an exclusion of time under the Speedy Trial Act until October 31, 2023. The Government requests an exclusion of time from October 31, 2023 until the next status conference pursuant to 18 U.S.C. § 3161(h) so that the parties may continue their plea discussions, defense counsel may continue to consult with the defendant, and the parties can finalize a resolution of the matter. The ends of justice served by the granting of the continuance requested outweigh the interests of the public and defendant in a speedy trial.

Defense counsel consents to these requests.

Granted. The conference is adjourned to 12/20/23, at 10:00 Time is excluded until then, in the interests of justice, to allow the Parties to complete their discussions toward a resolution of this case. The interests of justice from this exclusion outweigh Defendant's and the public's interests in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A). By:

So Ordered.

10/20/23

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

/s/ Kathryn Wheelock
Kathryn Wheelock
Assistant United States Attorney
Southern District of New York
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